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*Counsel to Creditor Oath (Americas) Inc.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, et al.,<sup>1</sup>  
  
Debtors.

Chapter 11

Case No. 18-23538 (RDD)  
(Jointly Administered)

**NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL  
NOTICE AND DOCUMENTS OF OATH (AMERICAS) INC.**

**PLEASE TAKE NOTICE** that Oath (Americas) Inc. (“Oath”), a creditor and party in interest in the above-entitled bankruptcy cases, hereby enters its appearance by and through its counsel, Bialson, Bergen & Schwab, a Professional Corporation, pursuant to 11 U.S.C. 1109(b) and Rule 9010 of the Federal Rules of Bankruptcy Procedure (“Rule 9010”).

**PLEASE TAKE FURTHER NOTICE** that Oath hereby requests that all notices, pleadings, documents, and correspondence required to be served on creditors, all duly appointed committees, and

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

any other party-in-interest pursuant to 11 U.S.C. §§ 102(1) and 342, Rule 2002 and Rule 9007 of the Federal Rules of Bankruptcy Procedure, order of the Court and otherwise, whether sent by the Court, the debtor, or any other party-in-interest in these cases, be served on the following counsel for Oath and that the following counsel be added to the Court's master mailing list:

**BIALSON, BERGEN & SCHWAB,**  
**a Professional Corporation**  
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**PLEASE TAKE FURTHER NOTICE** that, pursuant to §1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telecopy, email or otherwise filed or made with regard to the above-referenced cases and any proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that filing this Appearance and Request for Notice and Documents (A) is not, and may not be deemed or construed to be, (1) a waiver of Oath's substantive or procedural rights (collectively, "Oath's Rights"), including without limitation: (i) the right entry of a final order in noncore matters only after *de novo* review by a Federal District Court, (ii) the right to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (iii) the right to have the reference withdrawn by a Federal District Court in any matter subject to mandatory or discretionary withdrawal, and (iv) any other rights, interests, claims, actions, setoffs, or recoupments, or (2) consent to the jurisdiction of the Court, and (C) hereby reserves all Oath's Rights.

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Dated: October 24, 2018

Respectfully submitted,

BIALSON, BERGEN & SCHWAB,  
A Professional Corporation

*/s/ Thomas M. Gaa*

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